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April 24, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band, GN Docket No. 18-122

Ex Parte Letter

Dear Ms. Dortch:

Over the past months INSP, LLC ("INSP") has been in discussion with the C-Band Alliance ("CBA") regarding the current FCC NPRM process intended to repurpose C-band spectrum to support terrestrial 5G services in the United States. We would like to take this opportunity to endorse the CBA plan based on the following key issues.

C-band spectrum remains a key element of our business: Our media services are distributed to our affiliates over satellite utilizing the C-band spectrum. The reach, reliability and economic efficiency of these satellite services is unparalleled, and there are no other alternate means of distribution that are feasible in the foreseeable future. It has been suggested by some filings that programmers and broadcasters can quickly move content distribution to fiber or alternate satellite frequencies (Ku-band). We have evaluated these technologies and there is a large gap in availability, coverage, reliability and economics. Being forced out of our current C-band services would dramatically increase our cost structure, reduce our ability to serve our customer communities and negatively impact our business.

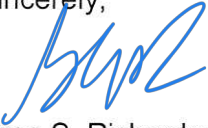
The CBA has designed a comprehensive plan that provides continuity for our services: The CBA has designed a comprehensive plan that orchestrates constructing and launching satellites, migrating customer transmission services into the upper 300 MHz of the spectrum, upgrading all of the C-band receive sites and providing funding insight and completion guarantees. Under the CBA plan, services will be migrated and protected in the upper 300 MHz of the spectrum, allowing 5G and our media distribution services to operate in an interference free environment. To date, we see no other solution that provides this level of detail or any other group that can deploy the resources required to create the environment required to support our services.

In the final conclusion: To the extent that the FCC decides that C-band spectrum must be repurposed, INSP believes that only 200 MHz should be repurposed and that only one proposal under consideration by the FCC will protect incumbent C-band customers while repurposing that amount of spectrum. INSP therefore endorses the CBA's Market-Based Approach and urges the Commission to adopt it.

April 24, 2019
Marlene H. Dortch, Secretary
Federal Communications Commission

Thank you for your consideration. We are available for further discussion at any time.

Sincerely,

A handwritten signature in blue ink, appearing to read "GSR", is written over the word "Sincerely,".

Greg S. Richardson, Esq.
VP, Managing Attorney
Legal & Business Affairs

GSR/cf